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6 Attorneys for Defendant,
OCMBC, INC. dba
7 LOANSTREAM MORTGAGE

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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION**
11

12 KIMBERLY HUDSON-BRYANT,
individually and on behalf of all others
13 similarly situated,

14 Plaintiffs,

15 v.

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17 OCMBC, INC. dba LOANSTREAM,
PREMIER FINANCIAL MARKETING
18 LLC D/B/A RESMO LENDING, AND
SEAN ROBERTS
19

20 Defendants.
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Case No. 8:24-cv-00067-FWS-JDE

**JOINT MOTION AND
STIPULATION TO CONTINUE
CASE DEADLINES**

Judge: Hon. Fred W. Slaughter

Magistrate: Hon. John D. Early

Action Filed: January 11, 2024

Trial Date: May 12, 2026

1 Pursuant to Local Rules 7-1 and 7-3, and Section VIII of the Court’s Civil
2 Standing Order, Plaintiff Kimberly Hudson-Bryant (“Plaintiff”) and Defendants
3 OCMBC, Inc. d/b/a LoanStream (“LoanStream”) and Sean Roberts (“Roberts”)
4 (collectively, “Defendants”) (together with Plaintiff, the “Parties”) hereby stipulate
5 and agree as follows:

6 WHEREAS, the Court issued a scheduling order under Federal Rule of Civil
7 Procedure 26(f) on October 24, 2024, (“Scheduling Order”) (ECF No. 48).

8 WHEREAS, the Court issued its Order re Joint Motion and Stipulation to
9 Continue Case Deadlines (“Revised Scheduling Order”) on April 28, 2025 (ECF No.
10 50);

11 WHEREAS, the Court issued its MODIFIED Order Re Joint Motion and
12 Stipulation to Continue Case Deadlines (“Modified Scheduling Order”) on June 25,
13 2025, which further continued the non-expert discovery cut-off to October 9, 2025,
14 and continued related litigation dates (ECF No. 52);

15 WHEREAS, the Parties have continued to engage in substantial written and
16 oral discovery since the Court issued the Revised Scheduling Order and Modified
17 Scheduling Order, but ongoing health-related scheduling issues involving both
18 Plaintiff and a key percipient witness and LoanStream’s 30(b)(6) witness prevent the
19 completion of discovery pursuant to the Modified Scheduling Order, which in turn
20 prevents compliance with the class certification and expert discovery deadlines.

21 WHEREAS, the Parties now jointly agree, stipulate, and request that the Court
22 vacate and continue all deadlines in the Modified Scheduling Order by approximately
23 120 days, as proposed below or as otherwise convenient for the Court.

24 WHEREAS, the Parties have exercised due diligence to date and believe good
25 cause exists to modify the Modified Scheduling Order for the reasons outlined herein
26 and in the accompanying declarations of Thomas F. Landers and Andrew R. Perrong,
27 filed concurrently herewith.

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NOW, THEREFORE, THE PARTIES HEREBY STIPULATE, AGREE and request that the Court extend all future deadlines in this case as follows:

Event	Current Deadline	Proposed Deadline
Start of Jury Trial	05/12/26	09/08/26
Final Pretrial Conference/Hearing on Motions in Limine	04/16/26	08/13/26
L/D to File Motion for Class Certification	10/16/25	02/12/26
L/D to File Opposition to Class Certification	11/12/25	03/11/26
L/D to File Reply to Class Certification	11/26/25	03/25/26
Hearing on Motion for Class Certification	12/18/25	04/16/26
Non-Expert Discovery Cut-Off	10/09/25	02/05/26
Expert Disclosure (Initial)	10/27/25	02/23/26
Expert Disclosure (Rebuttal)	11/10/25	03/09/26
Expert Discovery Cut-Off	11/13/25	03/12/26
Last Date to Hear Motions	01/15/26	05/14/26
L/D to Complete Settlement Conference	02/19/26	06/18/26
Trial Filings (First Round)	03/12/26	07/09/26
Trial Filings (Second Round)	03/19/26	07/16/26

IT IS SO STIPULATED.

[Signatures on Following Page]

1 DATED: September 23, 2025 SOLOMON WARD SEIDENWURM &
2 SMITH, LLP

3
4 By: /s/ Thomas F. Landers
5 THOMAS F. LANDERS
6 Attorneys for Defendant,
7 OCMBC, INC., dba
LOANSTREAM MORTGAGE

8 DATED: September 23, 2025 PARONICH LAW, PC

9
10 By: /s/ Anthony L. Paronich
11 ANTHONY L. PARONICH
12 Attorneys for Plaintiff,
13 KIMBERLY HUDSON-BRYANT

14 DATED: September 23, 2025 PERRONG LAW LLC

15
16 By: /s/ Andrew R. Perrong
17 ANDREW R. PERRONG
18 Attorneys for Plaintiff,
19 KIMBERLY HUDSON-BRYANT

20 DATED: September 23, 2025 DEFENDANT PRO SE

21
22 By: /s/ Sean Roberts
23 SEAN ROBERTS
24 Individual Defendant
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ATTESTATION OF SIGNATURE

Pursuant to Central District Local Rule 5-4.3.4(a)(2)(i), I hereby certify that the content of this document is acceptable to Mr. Anthony L. Paronich and Mr. Andrew R. Perrong, counsel for Plaintiff, and Mr. Sean Roberts, defendant *pro se* in this action. I further certify that I obtained authorization from Mr. Paronich, Mr. Perrong, and Mr. Roberts prior to affixing their electronic signatures to this document.

/s/ Thomas F. Landers
THOMAS F. LANDERS
Attorneys for Defendant,
OCMBC, INC. dba
LOANSTREAM MORTGAGE